

Exhibit RRR

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Attorneys for Defendant PACIFIC GAS AND
ELECTRIC COMPANY

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

PACIFIC GAS AND ELECTRIC
COMPANY,

Defendant.

Case No. 14-CR-00175-WHA

**DECLARATION OF [REDACTED] IN
SUPPORT OF RESPONSE TO SIXTH
REQUEST RE DIXIE FIRE**

Judge: Hon. William Alsup

1 I, [REDACTED], hereby declare under penalty of perjury as follows:

2 1. I make this declaration based upon personal knowledge and if called as a witness I
3 could and would testify competently to the matters set forth herein.

4 2. I am a Journeyman Distribution Operator with Pacific Gas and Electric Company
5 ("PG&E").

6 3. On July 13, from approximately 2:00 p.m. to 10:00 p.m., I worked in the Northern
7 Distribution Control Center ("NDCC") as one of the operators responsible for the Northern Valley
8 District (which includes the Bucks Creek 1101 12kV Line). During that time I supervised the
9 work of an Apprentice Distribution Operator [REDACTED] ("NDCC Operator #2") as he operated
10 the Northern Valley District.

11 4. On July 13th, I listened to Apprentice Distribution Operator's conversation with a
12 troubleman, [REDACTED] ("Dixie Troubleman"), who described seeing at least one blown fuse
13 on the Bucks Creek 1101. At the time, I thought that the cause of the outage at the Cresta Dam
14 was the blown fuse condition described by Dixie Troubleman. At that time, I did not know the
15 cause of the blown fuse condition.

16 5. In my experience, outages due to one or more fuses operating is a routine
17 occurrence. In my experience, there are numerous potential causes of fuses operating, with the
18 most common being faults caused by birds, squirrels, tree limbs falling, tree contacts, the wind
19 blowing lines together and other similar events. The operation of the fuse is designed to end the
20 fault event by preventing current from continuing downstream from the source on the conductor
21 experiencing the fault. In my experience, operation of one or more fuses is not in itself a reason to
22 de energize the line and thereby cut power to all users.

23 6. At around the conclusion of the call, because the Dixie Troubleman advised that he
24 had not yet been able to reach the fuses, I reviewed the real time phase load and ground current
25 data for Bucks Creek 1101 reported by the RT SCADA system. I did not see any anything
26 indicating a reason to de-energize the entire line. I previously had looked at the historical phase
27 loads and ground current for the line, and at the real time data, at around the time [REDACTED]
28 ("NDCC Operator # 1") briefed me on the situation and handed off operation of the Northern

1 Valley District to me and NDCC Operator #2. I did not see any anything indicating a reason to
2 de energize the entire line at that time either.

3 7. At no time during my shift did I see evidence of a ground fault in the real time
4 SCADA data for the Bucks Creek 1101 Line.

5 I declare under penalty of perjury that the foregoing is true and correct to the best of my
6 knowledge.

7 Executed this 8th day of December, 2021, in the City of Rocklin, County of Placer, State
8 of California.

